

**UNITED STATES BANKRUPTCY  
COURT SOUTHERN DISTRICT OF  
NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)  
  
(Jointly Administered)**

**AFFIDAVIT AND DISCLOSURE STATEMENT OF WILLIAM J. DIGGS,  
ON BEHALF OF DLA PIPER LLP (US)**

STATE OF NEW JERSEY    )  
  ) s.s.:  
COUNTY OF ESSEX        )

William J. Diggs, being duly sworn, upon his oath, deposes and says as follows:

1. I am an associate of DLA Piper LLP (US), located at 51 John F. Kennedy Parkway, Suite 120, Short Hills, NJ 07078-2704 (the "**Firm**").
2. Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), have requested that the Firm provide services to the Debtors, and the Firm has consented to provide such services (the "**Services**").
3. The Services include, but are not limited to, legal advice and representation, including, but not limited to, litigation with private parties and government entities.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

7. As of the commencement of this chapter 11 case, the Debtors owed the Firm \$ 87,095.00 in respect of prepetition services rendered to the Debtors.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on December 6, 2019, at Short Hills, NJ.



William J. Diggs

SWORN TO AND SUBSCRIBED before  
me this 6<sup>th</sup> day of December, 2019

  
Notary Public

**GLADYS BOLELLA**  
Notary Public - State of New York  
NO. 01BO6179073  
Qualified in Richmond County  
Certificate Filed in New York County  
My Commission Expires Dec 24, 2019

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”).

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

Stephen C. Matthews, DLA Piper LLP (US)

51 John F. Kennedy Parkway, Suite 120, Short Hills, NJ 07078-2704

2. Date of retention: Various dates beginning on Jan. 23, 2018.

3. Type of services to be provided:

Legal advice and representation, including, but not limited to, litigation with

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private parties and government entities. \_\_\_\_\_

4. Brief description of services to be provided:

The legal services provided include, but are not limited to, preparing pleadings, \_\_\_\_\_

motions, briefs, and letters and engaging in discovery and case strategy. \_\_\_\_\_

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly \_\_\_\_\_

(a) Average hourly rate (if applicable):

\$526.00 \_\_\_\_\_

(b) Estimated average monthly compensation based on prepetition retention  
(if company was employed prepetition):

\$121,294.00 \_\_\_\_\_

6. Prepetition claims against the Debtors held by the company:

Amount of claim: \$87,095.00 \_\_\_\_\_

Date claim arose: Various dates prior to Sept. 15, 2019. \_\_\_\_\_

Nature of claim: Fees for legal services. \_\_\_\_\_

7. Prepetition claims against the Debtors held individually by any member,  
associate, or employee of the company:

Name: N/A \_\_\_\_\_

Status: N/A \_\_\_\_\_

Amount of claim: \$ N/A \_\_\_\_\_

Date claim arose: N/A \_\_\_\_\_

Nature of claim: N/A \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

N/A \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

9. Disclose whether the professional currently represents any of the Debtors' existing shareholders, including trusts, beneficiaries, companies, affiliates, family members and any similar related parties (together, the "**Shareholder Parties**"), and/or any entity owned or controlled by any Shareholder Party (in each case other than any Debtor), and whether any Shareholder Party or any entity owned or controlled by any Shareholder Party (other than any Debtor) accounted for more than 1% of the professionals' annual revenue for any of the last five years. If so, describe what ethical walls or other protections are in place with regard to the concurrent representations.

In addition to representing Purdue Pharma L.P., DLA Piper attorneys

represent the following Shareholder Parties:

(i) Mundipharma entities (Mundipharma Brasil Produtos Médicos e

Farmacêuticos Ltda.; Mundipharma (China) Pharmaceutical Company Ltd.;

Mundipharma Deutschland GmbH & Co. KG; Mundipharma GmbH;

Mundipharma MEA GmbH; Mundipharma International Limited; Mundipharma Medical CEE GmbH; Mundipharma Medical Company; Mundipharma Near East GmbH; Mundipharma Research GmbH & Co. KG): compliance and regulatory work; (ii) Pharmaceutical Research entities (Pharmaceutical Research Associates Magyarorszag Kft; Pharmaceutical Research Associates, Inc.): episodic corporate assignments.

Additionally, DLA Piper attorneys have previously represented the following Shareholder Parties: Krugmann GmbH; Napp Pharmaceuticals Group Limited.

None of the aforementioned Shareholder Parties accounted for more than 1% of DLA Piper's annual revenue for any of the last five years.

In terms of screening processes, DLA Piper offices outside of the United States do not have access to the files of any entity represented only by a DLA Piper office within the United States. Additionally, Purdue's litigation files are screened such that only individuals assigned to those matters have access to those files.

10. Name and title of individual completing this form:

William J. Diggs

Dated: February 24, 2020